

SCHWARTZ, CONROY & HACK, PC

Making Insurance Companies Keep Their Promises

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November 18, 2024

VIA ECF

Honorable Frederic Block
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Government Employees Insurance Company, et al. v. Zaitsev, et al.
Docket No.: 20-cv-03495-FB-SJB

Dear Judge Block:

We represent Dr. Zaitsev and all other remaining Defendants in the above matter. We write on consent for an extension of time to serve our client's opposition to the Motion for Summary Judgment served by Plaintiffs, as well as an extension of time for Plaintiffs to serve their reply and for the motion to be filed and fully submitted. Defendants request this additional time to prepare a proper opposition to the detailed and lengthy motion.

The parties, on consent, have agreed that the opposition to the Motion for Summary Judgment will be served by Defendants via email on or before **November 27** (rather than the current date of November 18). Plaintiffs shall serve their reply by **December 23, 2024** and the motion will be filed in its entirety the same day (rather than December 20). While motion practice is ongoing, and to preserve the *status quo*, the parties have agreed to cooperate with one another to adjourn pending state court collection actions being prosecuted by the Defendants to avoid those matters proceeding to trial or judgment.

We thank the Court for its attention to this matter.

Very truly yours,

SCHWARTZ, CONROY & HACK, PC

By: Robert E. Hewitt
Robert E. Hewitt, Esq.